

STATE OF GEORGIA )  
 )  
COUNTY OF DADE )

**AFFIDAVIT**

Bill Simpson, being duly sworn, deposes and says:

1. I am over the age of eighteen and of sound mind;

2. I have personal knowledge of the facts herein;

3. During the 2002 Alabama's Gubernatorial campaign I assisted the Bob Riley  
campaign when they requested help on matters in Northeast Alabama;

4. On November 5, 2002, the election for Alabama's Governor was held and Bob Riley  
was declared the winner;

5. Bob Riley won by approximately 3,120 votes;

6. Don Siegelman contested the results of the election and refused to concede;

7. On or about the week after the election, I was asked to find out why Bob Riley's  
campaign signs were disappearing in Northeast Alabama;

8. I found out a Jackson County attorney was putting the Bob Riley signs up in an area  
where a Ku Klux Klan rally was to take place in Jackson County, Alabama on November 16,  
2002;

9. As proof that this was a trick by this attorney, who I believed to be a Democrat, I took  
pictures on a disposal camera of this attorney putting up the signs;

10. On Monday after taking the pictures I had a case in Jackson County and had a chance to encounter the attorney that I had seen putting up the signs. At this encounter he was showing pictures that he had taken of the signs to other attorneys there in the court house and I asked to see them. He allowed me to see the pictures and when I asked he gave me a couple of the photos and told me that these pictures were on a web site. The attorney was trying to suggest the Klan had a rally and the Klan was supporting Bob Riley, and after getting the pictures I left the courthouse and I placed a call to Rob Riley, Bob Riley's son, on my cell phone and informed him of the pictures and the information regarding the missing campaign signs and the web site. After I spoke with Rob he told me they had been getting calls about the internet site and were trying to determine where the pictures had come from;

11. Throughout the day of Monday, November 18 there were multiple calls to me from Rob Riley and other people about the pictures I had taken and the trick this attorney who I believe to be a Democrat was trying to pull;

12. 1. Rob Riley, William "Bill" Canary and Terry Butts were participants in one of the calls;

13. During the call Rob Riley was upset about the pictures and internet trick and wanted to go to the press but was told by Terry Butts that he would confront Siegelman regarding the signs and get him to withdraw his contest of the election and he believed that Don Siegelman would concede by the ten o'clock news when confronted with these pictures and the internet so as to avoid any embarrassment to Don Siegelman. Terry claimed that he would be able to assure Don that this would all be over if he would concede;

14. Rob Riley asked about Siegelman being a problem in the future if they did not go to the press, but he was told by William "Bill" Canary not to worry about Don Siegelman that "his girls would take care of him" and at this time the election contest needed to be put behind them to let Terry talk to Don and get him to concede;

15. William "Bill" Canary identified "his girls" as Leura Canary, his wife, and Alice Martin, the U.S. Attorney for the Middle and Northern District's of Alabama;

16. Rob Riley then asked if he was sure these "girls" could take care of Don Siegelman and William "Bill" Canary told him not to worry that he had already gotten it worked out with Karl and Karl had spoken with the Department of Justice and the Department of Justice was already pursuing Don Siegelman;

17. Arrangements were made with me for me to meet a campaign worker of Bob Riley's to give the photos that I had received from the attorney in Jackson County and to give the disposal camera since I had not developed the pictures I had taken. I gave the photos and the disposal camera to the campaign worker.

18. Late that afternoon of November 18, 2002, I was called by Rob Riley and told Terry Butts had talked with Don Siegelman and that Don Siegelman would be resigning before the ten o'clock news;

19. Don Siegelman gave up his contest of the Alabama Governor's Election the night of November 18, 2002.

20. I did not realize until this past fall when I was having a conversation with Joe Espy that Don had never told his attorney why he conceded on November 18, 2002.

21. In February 2007, after I talked to the Alabama Bar, I called Richard Scrushy's attorney, Art Leach, and told him why I believed Don Siegelman had conceded and Mr. Butts' role in getting Mr. Siegelman to concede.

22. The reason I did this is because I believe everyone has a sixth amendment right to have an attorney who does not have a conflict and I believed that Mr. Butts did.

FURTHER AFFIANT SAITH NOT.

*Jim Simpson*  
Jim Simpson

Sworn to and subscribed before me, this the 21<sup>st</sup> day of May, 2007.

*Patricia Adams*  
Notary Public My Commission expires: 3-9-09

